

## REMARKS

In the November 8, 2004 Office Action, the Examiner noted that claims 16-29 were pending in the application and rejected claims 16-29 under 35 USC § 102(b) as anticipated by U.S. Patent 4,553,206 to Smutek et al. (Reference A in the November 8, 2004 Office Action). Claims 16-29 remain in the case. The Examiner's rejections are traversed below.

### Amendment of Specification

The change made to paragraph [0027] by this Amendment corrects a typographical error in the Substitute Specification filed August 15, 2001. No "new matter" has been added. Approval of the change to the Specification is respectfully requested.

### Clarification in Response to January 6, 2005 Examiner Interview

The undersigned wishes to thank Examiners Singh and Bella for the helpful telephonic Examiner Interview held January 6, 2005. During the Examiner Interview, Examiner Bella requested clarification of the phrase "a mapping of the mapping object" and an explanation of how the amended language is supported by the specification. Claim 16 has been amended to recite "how the digital image is modified to obtain the mapping object" (claim 16, lines 5-6) instead of "a mapping of the mapping object;" to more closely correspond to what is described at e.g., the first sentence of paragraph [0004] of the Substitute Specification filed August 15, 2001. If there are any questions regarding the meaning of the amended claim language or support in the specification, the Examiner is respectfully requested to contact the undersigned by telephone to arrange an Examiner Interview prior to the next Office Action.

In addition, Examiner Bella indicated that the description of Fig. 1 in paragraph [0027] was not clear. As noted above, paragraph [0027] has been amended to correct a typographical error which may have contributed to the lack of clarity. It is believed that methods for determining an "identification variable ... [that] permits uniquely defined assignment or virtually uniquely defined assignment of the first object 101 to the identification variable" are sufficiently well known that a person of ordinary skill would have little difficulty assigning an identification variable using any of the known techniques. If further explanation or examples are believed to be necessary, the Examiner is respectfully requested to contact the undersigned by telephone to arrange an Examiner Interview prior to the next Office Action, or include a request in the next Office Action.

**Rejections under 35 U.S.C. § 102(b)**

In item 4 on pages 2-4 of the Office Action, claims 16-29 were rejected under 35 U.S.C. § 102(b) as anticipated by Smutek et al. In rejecting claim 16, it was asserted that the "block reference number, which is essentially a logical address of the block" (Smutek et al., column 4, lines 57-58) "determines a mapping of the mapping object" (Office Action, page 3, line 2). However, as discussed during the January 6, 2005 Examiner Interview, column 4, lines 53-60 of Smutek et al. describes scanning, digitizing and compressing digital images "for storage and subsequent retrieval ... in blocks. Each block is identified by an image or text identification called a block reference number" (column 4, lines 54-58). No suggestion has been found in Smutek et al. that the "block reference number" does anything more than help indicate where the data is stored. In particular, no suggestion has been found that the operations performed on the data prior to storage are represented in any way by the "block reference number." Rather,

each digitized and stored image or body of text has a separately stored administrative record associated therewith. This record includes an Index Header and an Index. The Index Header includes such information as the source of the digitized information input, the sampling density, the degree of lightness, and the encoding or compression scheme. ... The Index includes an index which indicates where the compressed image information or text blocks are stored in memory.

(Smutek et al., column 4, line 60 to column 5, line 1).

Thus, the administrative record in the system taught by Smutek et al. associates the location of the data with information regarding how the data was created. However, there is no suggestion that the administrative record stores "at least one parameter which determines how the digital image is modified to obtain the mapping object" (claim 16, lines 5-6) or that this parameter is then used in "determining an index ... and referencing the mapping object by reference to the index" (claim 16, lines 7-8). Therefore, it is submitted that Smutek et al. does not teach or suggest the method recited in claim 16. Since claims 17-21 depend from claim 16, it is submitted that claims 16-21 patentably distinguish over Smutek et al. for the reasons discussed above and during the January 6, 2005 telephonic Examiner Interview.

Furthermore, claim 17, has been amended to recite that "the predefined process uses a plurality of subprocesses to at least one of transform and convert the digital image" (claim 7, lines 2-3). As noted above, the only operation disclosed by Smutek et al. after images have been digitized is compressing the images. No suggestion has been found in Smutek et al. of transforming or converting a digital image. Therefore, claim 17 further patentably distinguishes over Smutek et al. for this additional reason.

Claims 22, 28 and 29 have been amended to include limitations similar to those discussed above with respect to claim 16. Therefore, it is submitted that claims 22, 28 and 29 and claims 23-27 which depend from claim 22, patentably distinguish over Smutek et al. for the reasons discussed above with respect to claim 16.

#### **Request for Examiner Interview**

The undersigned welcomes the suggestion of Examiner Bella during the January 6, 2005 Examiner Interview of conducting another Examiner Interview prior to the next Office Action, if the Examiner believes that further amendment of the claims would help clarify the differences between the present invention and Smutek et al.

#### **Summary**

It is submitted that Smutek et al. does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 16-29 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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